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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA - San Francisco Division**

NICHOLLE VANNUCCI, ELLEN  
BROWN and DEBORAH DRAKE,  
individuals; and HOMELESS ACTION!,  
an unincorporated  
association,

Plaintiffs,

v.

COUNTY OF SONOMA, SONOMA  
COUNTY COMMUNITY  
DEVELOPMENT COMMISSION, CITY  
OF SANTA ROSA, and DOES I to XX,

Defendants.

CASE NO. 3:18-CV-01955-VC

**DECLARATION OF JENNIELYNN  
HOLMES IN OPPOSITION  
TO MOTION TO ENFORCE AND  
CLARIFY PRELIMINARY  
STIPULATED INJUNCTION**

Date: December 3, 2020  
Time: 10:00 a.m.  
Cttrm: 4, 17<sup>th</sup> Floor  
Judge: The Hon. Vince Chhabria

I, Jennielynn Holmes, declare as follows:

1. I am the Sonoma County Homeless Program Coordinator and Director of Shelter & Housing for Catholic Charities. I have personal knowledge of the facts set forth in this declaration and if called as a witness could and would competently testify thereto.
2. Catholic Charities of the Diocese of Santa Rosa is a non-profit organization which
3. I began my nonprofit career with Catholic Charities over 10 years ago. I hold a BA from UC Davis in History, Spanish and Sociology and an MA in Organizational Development from University of San Francisco.

1           4.       I am the Chief Program Officer with Catholic Charities and am principally  
 2 responsible for services we contract with the City of Santa Rosa to provide to those experiencing  
 3 homelessness, including Samuel Jones Hall, the Family Support Center, the Homeless Services  
 4 Center, and our Homeless Outreach Services Team (HOST).

- 5           •       The 138-bed Family Support Center in Santa Rosa and the 27-bed Rainbow  
 6 House in Napa serve the region's most vulnerable families with children facing  
 7 homelessness. Our three Nightingale facilities in Santa Rosa and Napa provide a  
 8 total of 37 beds for hospital referred patients experiencing homelessness to heal  
 9 and connect with permanent, affordable housing.
- 10          •       We operate two permanent housing sites: The Palms Inn, Santa Rosa, a national  
 11 model providing 104 permanent housing units with supportive services for  
 12 chronically homeless adults and veterans. Imola House in Napa provides 8-units  
 13 with wraparound services similar to those of The Palms Inn.
- 14          •       Catholic Charities' HUD-Certified Housing and Shelter programs serve over 3,500  
 15 children and adults experiencing or at risk of homelessness in Sonoma and Napa  
 16 counties each year. In the last three years, Catholic Charities has permanently  
 17 housed over 2,000 individuals. Compassionate and persistent case management  
 18 has provided hope for individuals and families rebuilding their lives.
- 19          •       The Homeless Services Center in Santa Rosa offers drop-in services such as  
 20 showers, laundry, telephone access, mail service, as well as information and  
 21 referrals to supportive services and shelter. This hub for the HOST team allows  
 22 staff to build lasting trust with unsheltered individuals seeking a new life in  
 23 housing.
- 24          •       Catholic Charities manages Coordinated Entry, Sonoma County's centralized  
 25 homeless intake program, a "no wrong door" entrance for those experiencing  
 26 homelessness to access housing and support services.
- 27          •       To help reduce the spread of COVID-19, our Sam Jones Hall staff, in partnership  
 28 with the City of Santa Rosa, developed the Finley Safe Distancing Site, a

1 socially-distanced area with shelter services.

2 5. Catholic Charities utilizes the Housing First Model, the homeless assistance  
3 approach that prioritizes providing permanent housing to people experiencing homelessness, thus  
4 ending their homelessness and serving as a platform from which they can pursue personal goals  
5 and improve their quality of life. This approach is guided by the belief that people need basic  
6 necessities like food and a place to live before attending to anything less critical, such as getting a  
7 job, budgeting properly, or attending to substance use issues. Additionally, Housing First is based  
8 on the theory that client choice is valuable in housing selection and supportive service  
9 participation, and that exercising that choice is likely to make a client more successful in  
10 remaining housed and improving their life.

11 6. HOST - our Homeless Outreach Street Team - features a dedicated group of  
12 professionals who want to help anyone experiencing homelessness. They provide basic needs  
13 like toiletries and food, and counseling and assistance on where to access vital services. Our  
14 Homeless Outreach Street Team works closely with the Santa Rosa Police Department to identify  
15 and provide support by way of assessment, counseling on suitable alternative housing. I  
16 supervise HOST workers when the Team is activated to conduct outreach prior to the closure of  
17 a homeless encampment so that individuals are aware of options available to them.

18 7. I attend weekly meetings with the City of Santa Rosa Homeless Action Team  
19 ("HAT") and Homeless Encampment Assistance Team. ("HEAP") I work closely with David  
20 Gouin, the Director of the City's Department of Housing and Human Services, as well as Kelli  
21 Kuykendall, the City's Manager of Homeless Services, as well as Sgt. Jonathan Wolf, the  
22 Sergeant who heads up the DownTown Enforcement Team which handles closures of  
23 encampments when necessary. Prior to any camp closure, I attend HEAP meetings and discuss  
24 timing, notice, availability of housing options, and coordination of my HOST workers with  
25 SRPD.

26 8. At each of the encampment closures which are the subject of this motion, Doyle  
27 Park, Highway 101 underpasses, Corporate Center Parkway and Fremont Park, our HOST  
28 workers were present on site for days, sometimes weeks, prior to closure to alert the residents of

1 the forthcoming closure, to provide an opportunity for assessment by trained homeless outreach  
2 staff, to discuss housing options available to them that were adequate and reasonably suitable to  
3 meet their disability related needs.

4 9. Prior to each of the encampment closures, I personally coordinated with the staff  
5 in the Santa Rosa Department of Housing and Human services to confirm an adequate number of  
6 beds were available at Samuel Jones, the Sandman Hotel, as well as other housing options, so  
7 that should individuals wish to begin the transition from an unsheltered life to a sheltered life a  
8 suitable option was available to meet their reasonable needs.

9 10. After each closure my HOST staff reported to me the outcome of their efforts.

- 10 • At Doyle Park two individuals arranged for shelter beds;
- 11 • At the 101 Underpasses we contacted approximately 95 people, 30 of whom  
12 accepted placement, 4 at Sam Jones and 26 at the Finley Center safe distancing  
13 site.
- 14 • At Corporate Center Parkway a number of individuals were offered services. Of  
15 the individuals that HOST contacted, nine individuals initially accepted services  
16 at the Samuel Jones Hall Homeless Shelter or the Safe Social Distancing Program  
17 in the parking lot of Finley Community Center.
- 18 • At Fremont Park HOST reported that 41 people were engaged; 26 people refused  
19 engagement beyond a cordial greeting; 4 placements were made at Sam Jones  
20 Hall; 11 placements were made at the Finley Social Distancing Site; 3 people  
21 wait-listed for the Sandman; 2 people made appointments with HOST for  
22 resources and housing search; and one person made a housing appointment and  
23 received a housing voucher

24 I declare under penalty of perjury under the laws of the State of California that the  
25 foregoing is true and correct.

26 Executed on November 5, 2020, Santa Rosa, California.

27 */s/ Jennielynn Holmes*

28 JENNIELYNN HOLMES